



Modern Slavery Statement 2023



About this Statement

This Statement covers the activities of Winning Appliances Pty Limited (ABN 94 002 193 688), a company incorporated in Australia, and each of its related entities, including Appliances Online Pty Limited (ABN 19 151 833 546), Winning Services Pty Limited (ABN 34 152 213 039), Home Clearance Pty Limited (ABN 55 615 069 095), Andoo Pty Limited (ABN 49 115 622 172), Spence & Lyda Pty Limited (ABN 43 094 430 574 and ORA Restaurant Pty Limited (ABN 42 649 181 340) (collectively, the Winning Group) for the financial year commencing 1 July 2022 and ending 30 June 2023 (FY23 Statement Period).

This Statement sets our commitment to assisting in the prevention, response and remediation of modern slavery in all business activities and within our supply chains. It outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2018 (Cth) (MSA).

Acknowledgment of Country

In the spirit of reconciliation, the Winning Group acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

Speak-Up Hotline

Winning Group values the vigilance and feedback of our stakeholders to uphold our commitment to high standards of conduct and behaviour. If you have concerns about modern slavery or potential human rights issues in our operations or supply chain, we encourage you to reach out to us through our partner, Core Integrity. Your voice is important, and we are here to listen. You can contact us using the information below and can choose to remain anonymous when communicating with us.

Channel	Details
Web and Online	https://www.clearviewconnects.com/#/
Email	speakup@coreintegrity.com.au
Phone	1800 324 775
Mail	Speak Up, P.O. Box 895, Darlinghurst NSW 1300

For more detail refer to our Whistleblower Policy which can be found www.winninggroup.com.au/speak-up-policy



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A Message from our CEO

Across the Winning Group, we are committed to conducting business in an ethical and sustainable way, and to mitigate modern slavery risks in our supply chains. We have implemented comprehensive due diligence and risk mitigation frameworks, and are continuously increasing our capability to detect and remediate potential issues associated with the goods and services we procure.

Our Responsible Sourcing Roadmap, covering policy and governance, engagement and training, due diligence measures, and grievance mechanisms, continues to frame our actions in driving continuous improvement. As our internal understanding and capability has matured, we are able to broaden our efforts and implement wider business and external initiatives. Through our work with suppliers we can help reduce the risk of modern slavery, and over the last year we have focussed on providing training and education to suppliers who may lack the internal resources to tackle these issues. We launched a customer-facing initiative this year, highlighting more sustainable product choices of brands who achieved a 'beyond general compliance' score in their Modern Slavery Self-Assessment Questionnaire.

These developments are in line with our company's purpose to deliver inspiration and our mission to create the best experiences in the world, for the world. For our customers, our people, our communities and the planet. We believe that the purpose of our Modern Slavery Statement is to not only meet our obligations under the Modern Slavery Act, but to act as a platform to inform and educate our customers, teams, partners, and our ecosystem on the issues of modern slavery, so they can make better choices in their businesses and purchasing decisions.



John Winning
CEO, Winning Group

Our FY23 Key Actions



Governance, Systems and Processes

- Reviewed and updated our Modern Slavery Self-Assessment Questionnaire (MSSAQ).
- Reviewed and updated our Supplier Code of Conduct and made changes to reflect new requirements resulting from additional sourcing categories and partnerships.
- Delivered modern slavery capacity-building sessions to Business Unit (BU) and Group functions.
- Modern Slavery Committee members attended 87.8% of all quarterly meetings from each functional area and BU.



Risk Management and Due Diligence

- Conducted due diligence on over 90% of our suppliers by spend, on their actions to address modern slavery, carbon emissions, and sustainable packaging.
- 93.4% of our trade supply chain by spend met 'approved' criteria.
- Conducted due diligence on key service supply chains including 100% of cleaning, and 100% of seafood suppliers.
- Risk assessed 100% of sub-contracted trucking businesses.



Training, Awareness and Education

- Rolled out a Group-wide Modern Slavery Training Module with 74% of team members completing the module exceeding our target of 70%.
- 100% of our own-brand suppliers attended 1:1 capacity-building sessions.



Continuous Improvement / Innovation

- Launched 'Most Efficient Row' highlighting more water and / or energy efficient product choices to customers, whilst incentivising suppliers to achieve a 'progress beyond general compliance score' in their MSSAQ.



Monitoring and Reporting

- Sustainability Progress Report published, further communicating our commitment to prevent, respond to, and remediate modern slavery issues.

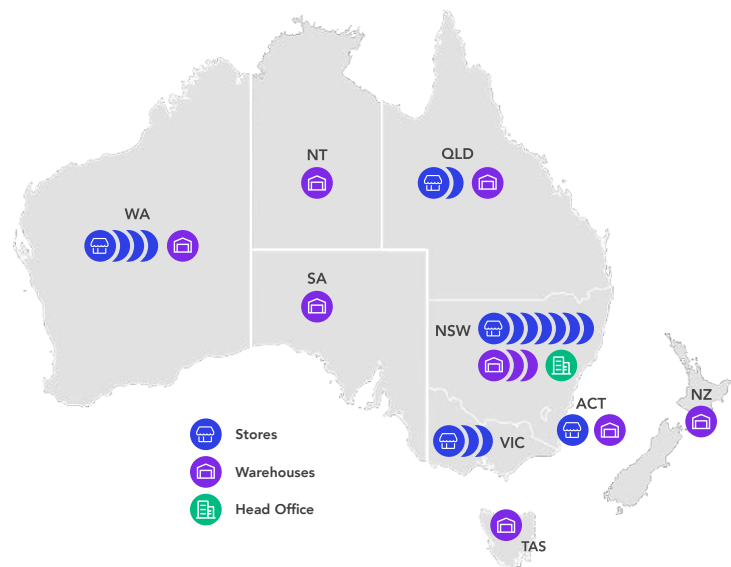
Our Structure, Operations and Supply Chains

For the purposes of this Statement, our key operating entities, operations, and associated supply chains during the FY23 Statement Period remained unchanged and were as follows:

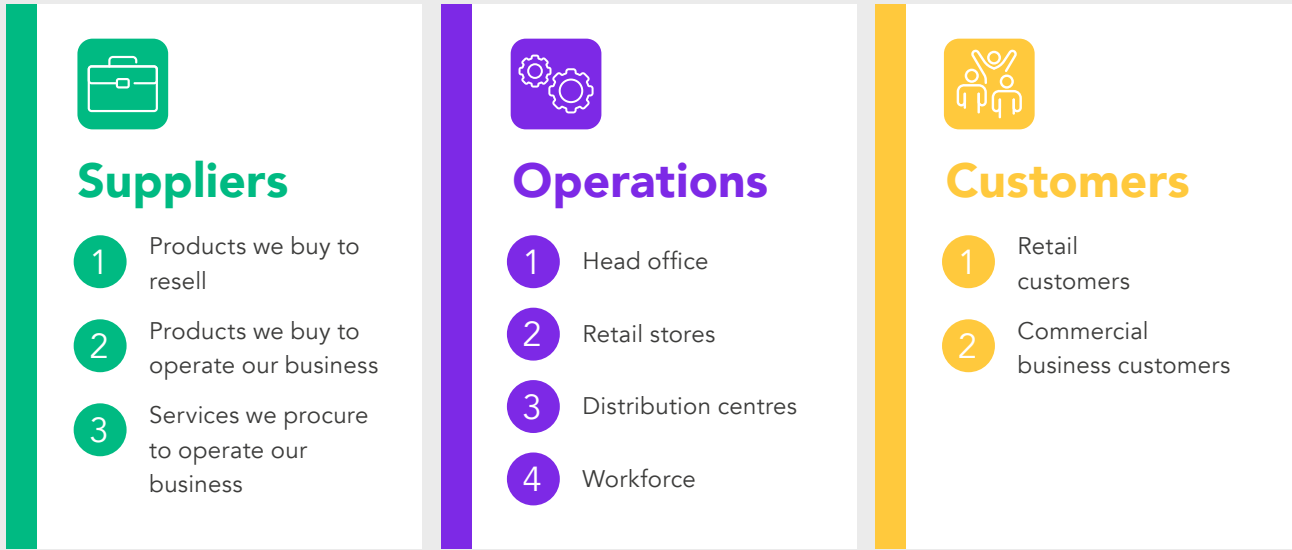


Figure 1: Our Locations

- 1** head office
- 2** country locations (Australia and New Zealand)
- 17** stores
- 6** distribution centres and 5 hubs
- 774** employees (271 women and 504 men)
672 full time, 56 part time, 48 casual
- 232** contractors



Our Supply Chain

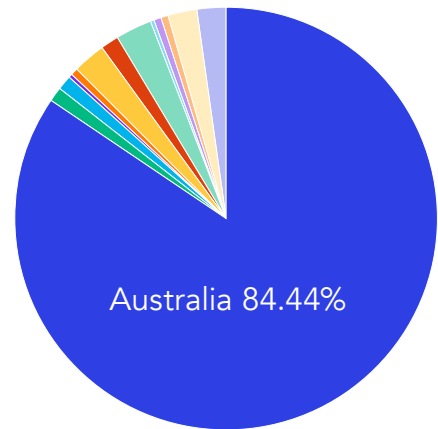
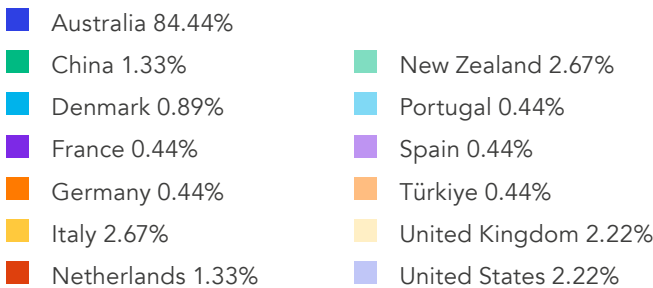


Supply Chain Mapping

In FY23 we procured products from **395** suppliers and services from **1733** suppliers.

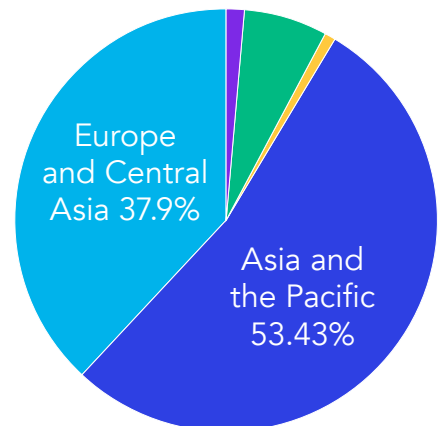
TIER 1 SUPPLIER LOCATIONS

Winning Group contracts directly with suppliers located in:



TIER 2-4 SUPPLIERS LOCATIONS

Around 88% of our Tier 1 suppliers disclosed the following sourcing and manufacturing locations in the last financial year:



Trade Supply Chain

We define trade supply chain as the products we buy from suppliers to resell to customers, this consists largely of local and international brands. Our trade supply chain accounted for approximately 79% of our total FY23 spend. We can further segment our trade supply chain into wholesale and branded suppliers, versus own-brand and direct import supply chain arrangements.

Wholesale and Branded Suppliers

- **99.58%** of trade supply chain spend
- **390** suppliers



Own-Brand and Direct Import

- **0.42%** of trade supply chain spend
- **5** suppliers



Non-Trade Supply Chain

We define our non-trade supply chain as the services we procure from suppliers to operate our business. Our non-trade supply chain accounted for approximately 21% of our total FY23 spend.

Service Suppliers

- **1733** suppliers
- Country of services: Australia, New Zealand, Indonesia, United States, Philippines, India
- Key service categories:

- | | |
|-----------------------------------------|------------------------------------------------------|
| » Cleaning service providers | » Insurance |
| » Uniforms and work attire | » Temporary labour hire |
| » Property rental | » Office consumables |
| » Delivery and install contractors | » Technology (hardware, software and cloud services) |
| » Customer service repair agents | » Utilities |
| » Waste and recycling service providers | » Professional services and consulting |
| » Forklift and equipment hire | » Agriculture and seafood |



Our Modern Slavery Risks

Winning Group recognises that our businesses may be exposed to human rights and modern slavery risks in our operations and supply chain and are firmly committed to conducting business in an ethical, legal and sustainable way. Our commitment includes risks that we may cause, contribute to or be directly linked to.

The MSA is aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), which have become the global standard for addressing and preventing human rights impacts associated with business activity.

The UNGPs discuss three separate concepts—cause, contribute, and directly linked—which form guiding principles to assist companies assess their connection to a negative impact and subsequent duty to provide a remedy.

Cause

A business may cause modern slavery (or other human rights harm) where its actions or operations directly result in modern slavery practices.

We could cause modern slavery in a limited range of circumstances for example if we required young workers to engage in hazardous work or perform overtime hours.

We have targeted internal human resources procedures and controls to ensure all Winning Group employees are subject to relevant awards or industrial instruments and subject to the National Employment Standards under the Fair Work Act 2009 (Cth). Wages and benefits meet or exceed all legal requirements.

Contribute

A business may contribute where its actions or omissions facilitate or incentivise modern slavery.

We could contribute to modern slavery if we placed unrealistic cost requirements or delivery timeframes on our services or goods suppliers, which would likely encourage the use of modern slavery practices, or if we knowingly ignored evidence that a supplier is engaging in modern slavery.

Our businesses regularly engage with our suppliers and maintain strong relationships. These relationships are pivotal to ensuring a continuous dialogue where impractical expectations can be properly understood and addressed.

Directly Linked

A business may be directly linked to modern slavery through its services, products or operations. This includes situations where modern slavery may occur in businesses' extended supply chain.

The greatest risk of modern slavery for Winning Group sits with our extended supply chain. For example, the Winning Group could be directly linked to modern slavery if we would purchase goods from a supplier who has a manufacturing site that exploits their workers.

Aligned to the UNGP's, we leverage our due diligence frameworks and supplier relationships to understand, influence and improve the actions taken by our suppliers to manage and mitigate modern slavery risks.

Operational Risks

During FY23, the Winning Group re-assessed the potential risks of modern slavery occurring within our direct operations as being low.

Our workforce is primarily located in Australia, and we have robust recruitment and onboarding processes and dedicated teams that ensure we comply with all relevant laws and candidates match our values and culture. Our recruitment is largely managed in-house, which provides us with the opportunity to directly control and govern the process. Additional policies that communicate and reinforce our expectations include our Code of Conduct, Equal Employment Opportunity, Recruitment Policy, and Speak Up / Whistleblower Policy.

Whilst the risk of us causing modern slavery in our directly controlled operations is low, we understand that there is a risk we may be contributing to, or are directly linked to, human rights issues in our operations due to the use of subcontracting of services including transport, logistics, and cleaning, as well as services that may be sent offshore. These issues may include underpayment, indentured workers, and exploitation of migrants in contracted and subcontracted services, such as transport and logistics.

Identifying Work Health and Safety Risks in our Operations

During this reporting period we placed additional focus on understanding any potential work health and safety, and modern slavery risks in our operations and amongst contractors. We have started by conducting a gap analysis in our Work, Health, and Safety (WHS) compliance and identifying different levels of risks. High risks identified included container dock safety; home installations; LO picker; residential and commercial deliveries of products; slips, trips and falls from height; engaging and managing contract drivers. We are working across functions to ensure our WHS is going beyond minimum compliance.

Structure of Supply Chain Arrangements

We have a variety of supplier agreements in place, both exclusive and non-exclusive, long-term and short-term. Our supply chain arrangements are managed by the relevant commercial entities within the business and are overseen by Winning Group's

internal centralised legal department, so that all relevant laws are complied with, including in relation to the MSA. While the risk of modern slavery for each supplier varies, our contractual arrangements with our suppliers include explicit provisions, warranties and obligations regarding modern slavery that the supplier must comply with. Winning Group places key emphasis on communication so that there is transparency and honesty about the supplier's products, sourcing, and associated risks.

Risk Assessment Methodology

In FY21 we assessed the risk of our supply chain and operations based on a social 'Life Cycle Assessment' approach, looking at inherent risks based on country of origin, industry, product, commodity, and spend level. This included an analysis of practices such as child labour, forced labour, excessive working time, exploitation of migrant labour, gender equality, legal systems, and corruption issues using the following:

- Social Hotspots Database (SHDB).
- Exiobase indicators on proportion of unskilled labour.
- Global Slavery Index's Prevalence and Vulnerability data.
- Child Rights Index and country due diligence response score.
- Evidence of modern slavery issues cited in an extensive literature review.

The prevalence of these factors are key triggers related to risks of modern slavery. The data was then converted into a heatmap, showing the location of risk. The risk baseline continues to underpin the Winning Group's approach. The opening of ORA restaurant in FY22, added the additional potential high-risk category of 'seafood' to our overall profile, triggering further risk controls, supplier engagement, and due diligence requirements which we outlined in the FY22 statement.

In FY23, our overarching risk profile based on sourcing locations and product categories has remained in line with FY22. However, we acknowledge that the prevalence of modern slavery and vulnerability associated with countries, industry sectors, and at-risk people continues to change due to factors such as tightening economic and evolving geopolitical situations. The cited literature outlined in FY21, continues to be reviewed each year to ensure the changing risk landscape is captured in our approach.

Supply Chain Risks

Approximately 99.58% of our trade supply chain is wholesale, contributing to a lower visibility, understanding and direct control of risks in this supply chain, compared to supply chains with a high percentage of own-label brands or direct import models. With such long and multi-tiered supply chains, there is poor visibility and control over recruitment and employment practices of tier 2-4 suppliers and their subcontractors that may operate in multiple high-risk countries, with low-regulated environments, low levels of education and public awareness, and high levels of corruption. Based on our assessment, we have identified that the following categories of products and services pose risks associated with modern slavery.

VERY HIGH RISK

SOURCING CATEGORY	RELATIONSHIP TO RISKS	KEY RISK FACTORS
Seafood	DIRECTLY LINKED	Overseas fishing supply chains with risks of limitations on freedom of movement, poor and unsafe working conditions, limited communication with family and excessive working hours ¹ , deceptive recruitment practices, forced labour, debt bondage, and physical and mental abuse.
Bathroom furniture, accessories and tiles	DIRECTLY LINKED	Overseas supply chains of the extraction and the manufacturing of timber, metal, plastic, ceramic, and leather products with specific risks of child labour, poor labour conditions, labour rights violations, health and safety issues, deceptive recruitment practices, debt bondage, forced labour, and excessive overtime hours. ²
Washbasins, bathtubs		
Furniture		
Leather furniture		

HIGH RISK

SOURCING CATEGORY	RELATIONSHIP TO RISKS	KEY RISK FACTORS
Bathroom furniture and accessories	DIRECTLY LINKED	Overseas supply chains of the extraction and the manufacturing of timber, metal, plastic, ceramic, and leather products with specific risks of child labour, poor labour conditions, labour rights violations, health and safety issues, deceptive recruitment practices, debt bondage, forced labour, and excessive overtime hours. ²
Tapware	DIRECTLY LINKED	
Appliances	DIRECTLY LINKED	Overseas supply chains of raw mineral extraction and the manufacturing of electronics and metal products with specific risks of labour rights, forced labour, child labour, deceptive recruitment practices, excessive working hours and unsafe working conditions ³ , work health and safety issues and funds armed conflict within the region. ⁴

MEDIUM RISK

SOURCING CATEGORY	RELATIONSHIP TO RISKS	KEY RISK FACTORS
Mattresses	DIRECTLY LINKED	Overseas supply chains of raw material extraction and the manufacturing of textiles and metal products with specific risks of child labour and poor labour conditions.
Equipment hire	DIRECTLY LINKED	Overseas supply chains of raw material extraction and the manufacturing of machinery, equipment, and parts with specific risks of poor labour rights and health and safety issues.

LOW RISK

SOURCING CATEGORY	RELATIONSHIP TO RISKS	KEY RISK FACTORS
Delivery and install contractors	CAUSE CONTRIBUTE	Unskilled labour of services such as transport and logistics with specific risks of underpayment, indentured workers, and exploitation of migrants.
Temporary staff and labour hire	CAUSE CONTRIBUTE	Subcontracted financial, administration, and business services, such as those involved in insurance, rent, and advertising with specific risks of poor labour rights in business-related services and professional services that may be offshored.
Property	DIRECTLY LINKED	
Advertising	DIRECTLY LINKED	

1. <https://www.walkfree.org/global-slavery-index/findings/spotlights/forced-labour-at-sea/>

2. <https://news.mongabay.com/2017/03/investigation-reveals-slave-labor-conditions-in-brazils-timber-industry/>; https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_111297.pdf

3. International Organisation for Migration, Submission 57, p. 3.

4. <https://www.verite.org/wp-content/uploads/2017/04/EO-and-Commodity-Reports-Combined-FINAL-2017.pdf>



How we Assess and Address our Modern Slavery Risks

Over the past three years, we have increased our capacity to assess and address modern slavery risks associated with our operations and supply chains and have embedded previous actions as business-as-usual into our operations.

Building on this, a key focus of our actions during this reporting period has been to conduct due diligence on newly acquired supply chains as well as developing and implementing training programs for key internal and external stakeholders. Our aim is to further increase capacity across our operations and supply chains to embed the assessment and addressing of modern slavery risks into our business.

Our cross-functional Modern Slavery and Responsible Sourcing Committee, consisting of senior leadership representation from our business units, including legal, procurement, strategy, marketing, and sustainability teams met regularly on a quarterly basis to oversee due diligence outcomes and progress against our KPIs. Ultimate accountability for human rights and modern slavery within our organisation sits with the Board of Directors.

Policy and Governance

Figure 2: Winning Group Modern Slavery Governance Structure



Policy Frameworks

POLICY TITLE	LINK TO MODERN SLAVERY	POLICY IMPLEMENTATION
Responsible Sourcing Roadmap	Our Responsible Sourcing Roadmap covers policy and governance, engagement and training, due diligence measures, and grievance mechanisms and provides us with a framework to continually deepen our capacity to assess and address modern slavery risks.	Is updated annually by the Sustainability team with key actions, KPIs and outcomes which are discussed and governed by the Modern Slavery and Responsible Sourcing Committee.
Supplier Code of Conduct	The Code of Conduct covers minimum expectations and standards in relation to labour, health and safety, environment and ethics and outlines our zero tolerance position on all forms of modern slavery.	Is referenced in supplier contracts and trading terms and applies to all suppliers of the Winning Group. The policy has also been made public through our group website and our brand websites such as Appliances Online. Of the suppliers we reviewed during the period, 89.2% either signed the policy or provided an equivalent policy. For those that do return a signed copy of our policy, we continue to engage until they have developed an equivalent policy.
Modern Slavery Self-Assessment Questionnaire (MSSAQ)	The MSSAQ is issued to assess modern slavery risks across our entire supplier base and produces risk ratings which help us identify suppliers where further investigation or support is required.	Managed by the Sustainability team in conjunction with Buying team members.
New Supplier Onboarding Process	Robust process which reviews supplier's governance processes, quality management, labour conditions, environmental impacts, and supply chain due diligence with additional audit requirements for high-risk suppliers.	Executed by the Sustainability team in conjunction with Buying team members.

Continued next page >

Policy Frameworks *continued...*

POLICY TITLE	LINK TO MODERN SLAVERY	POLICY IMPLEMENTATION
Speak Up / Whistleblowing Policy	Encourages the reporting of any actual or suspected wrongdoing or any other issues that may affect a team member's well-being at work or that may be affecting the Group, its customers or suppliers.	Accessible on the intranet via our policy handbook and communicated to new team members during the onboarding process.
Human Rights and Modern Slavery Policy	Support our actions to prevent and limit human rights violations and modern slavery in our business and supply chain.	Accessible on the intranet via our policy handbook and communicated to new team members during the onboarding process.
Modern Slavery Remediation Plan	To ensure each instance of suspected or actual case of modern slavery is investigated and appropriately addressed by the Group.	Accessible on the intranet via our policy handbook and communicated to new team members during the onboarding process.
Workplace Health and Safety	This policy and the various WHS procedures which exist are designed to ensure that workplace participants are not exposed to risks to their health or safety.	Accessible on the intranet via our policy handbook and communicated to new team members during the onboarding process. During FY23, the Group hired a resource, dedicated to Workplace Health and Safety (WHS) and Compliance to identify, respond, and manage risks occurring in our own operations.
Recruitment Policy and Onboarding Processes	Recruitment policy guides the selection of candidates complying with all relevant laws, while the onboarding process manages the integration of new team members, fostering a strong workforce aligned with our values and culture.	Available upon request from the Team Experience department.
Employee Code of Conduct	Outlines our expectations of team members and our company values to deter wrongdoing and to promote honest and ethical conduct.	Accessible on the intranet via our policy handbook and communicated to new team members during the onboarding process.

Awareness, Training, and Capacity Building

Building awareness and increasing capacity amongst our stakeholders was a key focus of the reporting period, resulting in the creation and delivery of educational sessions to a variety of internal and external stakeholders. We believe that empowering our team members, suppliers and customers with knowledge is key to further embedding and improving our responsible sourcing actions. We are embedding these training sessions into our business-as-usual and will continue to deliver these as and when required.

INTERNAL

EDUCATIONAL TYPE	CONTENT AND LINK TO MODERN SLAVERY	OUTCOME
Inhouse developed Modern Slavery Learning Module and Quiz built into our Learning Management System (LMS)	Defines and exemplifies modern slavery, and provides indicators and examples and ways to address.	74% of team members completed the module.
1:1 new team member training	Overview of Winning Group's approach to sustainability and modern slavery due diligence as part of their onboarding process.	5 hours of 1:1 training sessions.
Commercial team State Manager training	Outlines how to identify, address and mitigate the risks of modern slavery; our approach to supplier engagement and due diligence; and how we can support our clients to achieve their responsible sourcing goals.	A 1.5 hour training session and tailored education material.
Winning Services Transport Manager training	Understand, identify and respond to potential modern slavery risks within our local transport supply chains.	45 minute training session for 12 team members with tailored training material.
Sustainability team members	Online seminars, review of reports and attendance at key conferences, as well as providing insights and transparency on our sustainability initiatives including our responsible sourcing and modern slavery action plan externally at industry events.	50+ hours

EXTERNAL

EDUCATIONAL TYPE	CONTENT AND LINK TO MODERN SLAVERY	OUTCOME
Own-Brand Suppliers	Provide support across the key areas of social compliance, raw material and packaging selection, and responsible sourcing. We are continuing to work closely with these suppliers to ensure that they are progressing in these areas.	1:1 training and capacity building sessions, totalling 5 hours.
Small to Medium (SME) Suppliers	Training covering issues such as modern slavery risk identification and due diligence framework development.	1-hour supplier town hall for 12 supplier team members.
Public Awareness and Education	Voluntary publication of inaugural Sustainability Progress Report outlining environmental, community, responsible sourcing and education and awareness initiatives achieved during 2021-2022 demonstrating our commitment to transparency.	Accessible via our group and brand websites and made public via social media and public relations.

Case Study

Most Efficient Row

As part of our Responsible Sourcing Roadmap, we committed to highlighting more sustainable product choices to our customers, which we achieved in this reporting period through the launch of the 'Most Efficient Row' on our Appliances Online website.

'Most Efficient Row' highlights the top 20% most energy efficient and/or water efficient appliances across our key category ranges of refrigeration, dishwashers, washing machine, dryers and TVs.

In order to qualify for appearance in this row, suppliers of eligible products must achieve a 'Progress beyond general compliance' or 'Ideal Performance' score in their MSSAQ. The criteria and the methodology to qualify for the row have been developed to be aspirational, incentivising suppliers to take positive action and continually improve their processes across the areas of modern slavery, working conditions within the supply chain, and product development.

Notes

Most Efficient Product Details

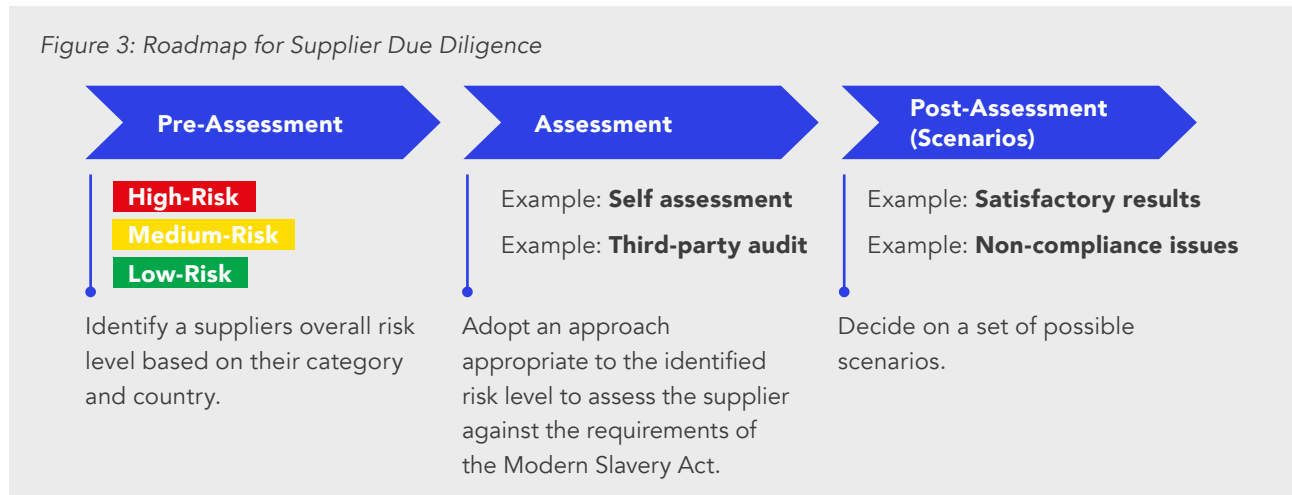
Most Water Efficient | This product falls within the top 20% (or next closest percentage interval) of most water efficient products on our website in this category based on publicly available data from the Water Efficiency Labelling and Standards (WELS) scheme. In addition, brands associated with these products have been reviewed by our business on their modern slavery, carbon management and packaging initiatives, actions and goals which forms part of their qualification to appear in this row.

Most Energy Efficient | This product falls within the top 20% (or next closest percentage interval) of most energy efficient products on our website in this category based on publicly available data from the Equipment Energy Efficiency Program. In addition, brands associated with these products have been reviewed by our business on their modern slavery, carbon management and packaging initiatives, actions and goals which forms part of their qualification to appear in this row.

Supplier Due Diligence

We reported and outlined in previous Modern Slavery Statements our due diligence roadmap covering pre-assessment based on risk profile, assessment approach appropriate to the identified risk level, and post-assessment scenarios depending on the results.

Figure 3: Roadmap for Supplier Due Diligence



Those suppliers that have achieved satisfactory results have been assessed against the following criteria and are approved by our Sustainability team:

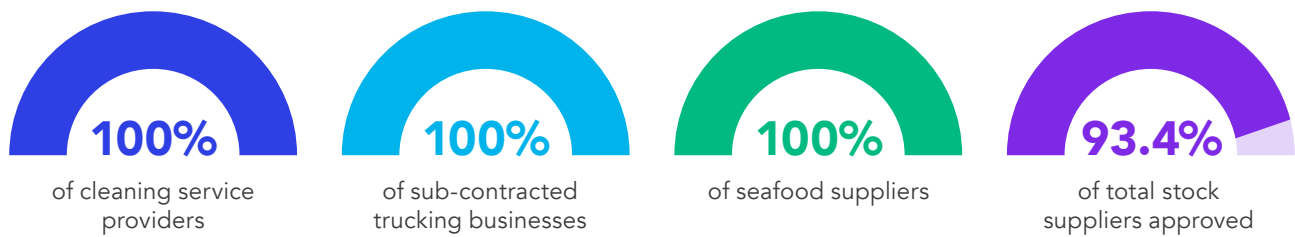
- Return a completed MSSAQ and support documentation;
- Following assessment, achieve a score of 'Compliant with local laws' or above;
- Suppliers determined to be high-risk are required to complete or provide a social compliance audit for review;
- Develop a corrective action plan to address any non-conformances; and
- Provide evidence of corrective action

Assessment

Our actions during FY23 focussed on:

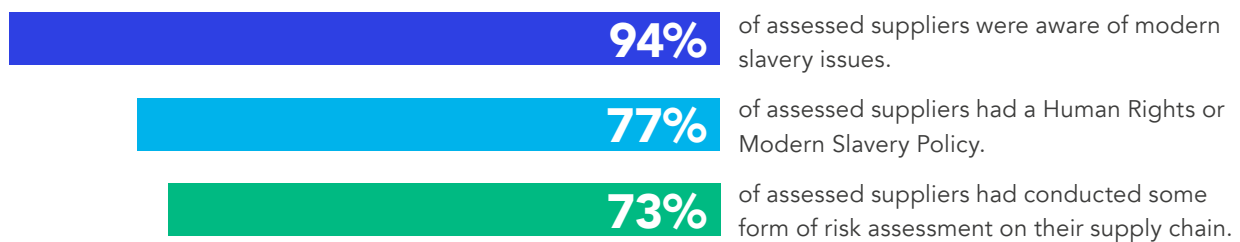
- Conducting due diligence on our remaining top suppliers;
- Gaining a further understanding of our newly acquired supply chains from the seafood, bathroom, and furniture industries;
- Conducting due diligence on service supply chains, including cleaning and logistics;
- Revising our Modern Slavery Self-Assessment Questionnaire (MSSAQ) for due diligence commencing in FY24, including:
 - » Updated modern slavery prevalence inputs for sourcing countries.
 - » Revised weighting of responses aligned to global best practice and our maturing Supplier Code of Conduct expectations of suppliers.
 - » Additional questions based on new risks relevant to the industries that we operate in.

Throughout the FY23 reporting period we completed the assessment of:



**All statistics are by spend*

Areas of good performance



Areas for improvement



The Winning Group acknowledges that many suppliers are at different stages of their sustainability journey. Progress in this area, particularly in relation to modern slavery, is often commensurate with the size and capacity of business. The Group takes an educational approach to supplier engagement, providing practical advice and actions for suppliers to implement to understand the risks of modern slavery in their supply chain, improve transparency and due diligence measures.

Grievance Mechanisms And Remediation

The Winning Group understands that effective grievance mechanisms and remediation are key to identifying and responding to modern slavery issues.

Over the past three years, we have strengthened and matured our capacity through our Speak Up Policy, responding to audit reports, and by developing a Remediation Plan.

Speak Up / Whistleblowing Policy

We actively encourage the reporting of any actual or suspected wrongdoing or any other issues that may affect a team member's well-being at work or that may be affecting the Group, its customers or suppliers, through our Speak Up/Whistleblower Policy. We recognise the importance of ensuring a safe, supportive, and confidential environment where people feel confident to 'Speak Up' about wrongdoing and feel supported throughout the process. We have had no reported complaints in FY23.

Off-shore Tier 2 Supplier Non-Conformance Remediation

Based on findings in independent third-party social compliance audit reports⁵, we identified issues against local laws with three off-shore tier 2 suppliers. In the FY22 Statement, we outlined our Modern Slavery Remediation Plan ensuring that each instance of suspected or actual case of modern slavery is investigated and appropriately addressed by the Group. We continue to be committed to assisting our partners in the remediation process.

Non-conformances identified

Based on findings in independent third-party social compliance audits the following non-conformances were identified:

Labour Rights:

- Excessive voluntary overtime hours
- Excessive voluntary weekly working hours
- Employees did not have 1 day off in every 7 days
- No social insurance for employees

Health and Safety:

- No safety labels on chemicals
- No soap or tissue provided in toilets
- No pre-employment occupational health check provided
- Some employees not wearing provided PPE

Actions taken in response to non-conformances identified

For health and safety and social insurance non-conformances categorised as minor, we found that suppliers:

- either had already remediated these prior to Winning Group requesting an audit report;
- or committed to remediate the non-conformance within the period stipulated by the auditor in the audit report, with verification to take place at the periodic follow-up audit.

Where non-conformances were categorised as major, particularly those relating to labour rights, Winning Group took a more involved approach by:

- educating the supplier on the need to remediate the non-conformance;
- understanding the root-cause of the non-conformance; and
- ensuring any remediation action plan was adhered to.

5. SMETA 4 Pillar Audit, amfori BSCI Audit.

Case Study

Remediation

An independent third-party social compliance audit report conducted in an off-shore tier 2 supplier factory, revealed non-conformances relating to consecutive days worked without a rest day, and excessive working hours.

At the time Winning Group received the follow-up audit report, our supplier had already remediated the non-conformance of consecutive days worked without a rest day.

However, working hours still did not appear to comply with the local laws in the operating country although they had significantly reduced since the initial audit. Winning Group engaged with our supplier to understand the root cause of the non-conformances presented which appeared to be linked to factory processes and systems failures. According to a further follow up audit report 8 months later, these non-conformances were resolved by the supplying factory.

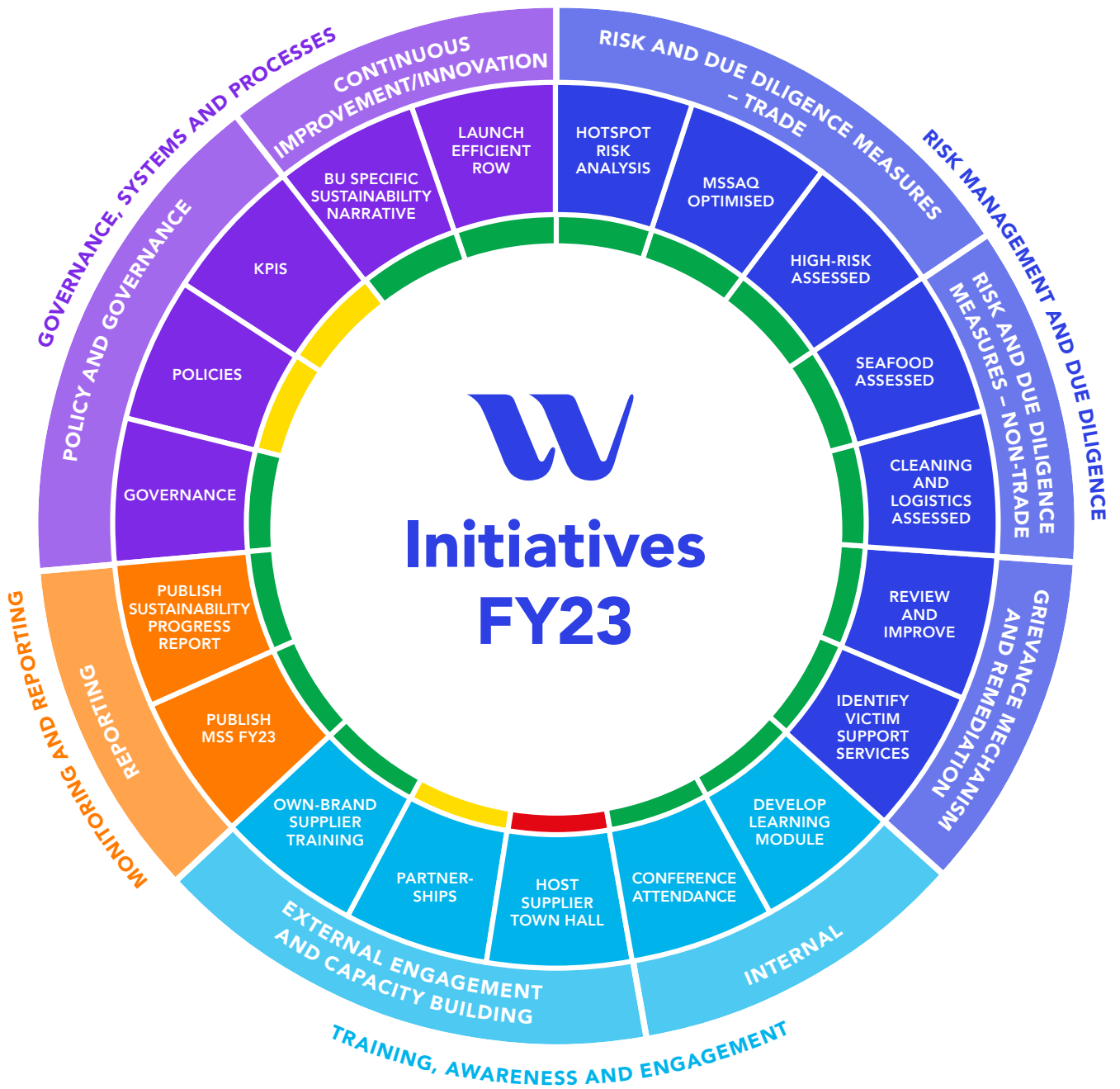
Our remediation process functioned as expected, due to the supplier's willingness to remediate the non-conformances.

How we Assess the Effectiveness of our Actions

We assess the effectiveness of our actions by reviewing expected outcomes and, where possible, key performance indicators of our Responsible Sourcing Roadmap covering policy and governance, engagement and training, due diligence measures, and grievance mechanisms. This is key in driving continuous improvement on our approach to identifying, managing, and mitigating modern slavery risks.

Our Modern Slavery and Responsible Sourcing Committee internally governs the progress against our Roadmap on a quarterly basis and is conducting annual evaluations of the outcomes achieved. We will incorporate learnings into actions for the following years, to ensure that we are continuously improving and that our actions have a measurable impact.

In addition, we continue to engage external consultants to review our reporting mechanism, including metrics and data to ensure our approach is always improving in line with mandatory reporting criteria and best practices.



GREEN

Initiatives at this level have performed as expected or better than expected, or are completed, or have met their target.

YELLOW

Initiatives at this level have performed a bit below expectations, or are partially completed, or have performed slightly below target.

RED

Initiatives at this level have performed well below expectations, or are not completed, or have performed significantly below target.

Our FY24 Commitments

Winning Group acknowledges that eradicating modern slavery requires continuous improvement and dedication from our business, our suppliers and the wider ecosystem we engage with. As our Responsible Sourcing Roadmap matures, we are implementing continuous improvement initiatives and deepening our commitment across our key focus areas.

We thank our suppliers and partners for their engagement and collaboration to assess and mitigate modern slavery risks in our operations and supply chains.

Moving forward into FY2024 and beyond we will continue to progress our Responsible Sourcing Roadmap and work to achieve the objectives and commitments for governance, systems and processes; risk management and due diligence; training, awareness and engagement; monitoring and reporting as outlined below:

GOVERNANCE, SYSTEMS AND PROCESSES

ROADMAP FOCUS AREAS	OBJECTIVE	FY24 KEY COMMITMENTS
Policy and Governance	Provide oversight of MS risks and management frameworks to guide our decision-making and continuous improvement.	<ul style="list-style-type: none"> Hold quarterly cross-functional Modern Slavery Committee meetings. Draft policy for minimum product standards. Integrate sustainability and modern slavery risk management KPIs into relevant business units.
Continuous improvement / Innovation	Continuously identify ways to improve the response and management of sustainability and modern slavery risks and opportunities.	<ul style="list-style-type: none"> Increase customer-facing visibility of brand and product sustainability attributes, including modern slavery. Increase range of sustainable suppliers and products.

RISK MANAGEMENT AND DUE DILIGENCE

ROADMAP FOCUS AREAS	OBJECTIVE	FY24 KEY COMMITMENTS
Risk and due diligence measures - trade	Effectively identify and address modern slavery risks in the Winning Group's trade supply chain.	<ul style="list-style-type: none"> Re-issue the FY23 revised MSSAQ and Supplier Code of Conduct to trade supply chain. Increase visibility of tier 2 suppliers identified as high or very high risk. Independent third-party audits conducted on high-risk own-brand supply chains. Implement requirements for top supplier annual non-conformance reporting. Assess existing terms with top suppliers. Ensure new supplier onboarding process is adhered to.
Risk and due diligence measures - non-trade	Effectively identify and address modern slavery risks in Winning's non trade supply chain.	<ul style="list-style-type: none"> Ensure new cleaning and logistics service suppliers complete MSSAQ prior to commencing business.
Grievance mechanism and remediation	Ensure adequate and effective grievance mechanisms include a remediation process to manage human rights impacts.	<ul style="list-style-type: none"> Ensure effective Grievance mechanism and adherence to Modern Slavery Remediation Plan. Ensure Grievance mechanism is accessible to our cleaning and logistics providers. Implement requirements for top supplier grievance mechanism reporting.

ROADMAP FOCUS AREAS	OBJECTIVE	FY24 KEY COMMITMENTS
Internal capacity building, engagement and training	Continue implementing modern slavery training to support identification and management of modern slavery risk.	Ensure new team members complete MS Learning Module.
	Develop specific modern slavery training for staff in key roles of responsibility as well as areas where modern slavery is more likely to occur e.g. Procurement, Legal, Sales and HR teams.	Enforce outstanding completion of the MS Learning Module.
		Reconduct MS training for the Buying team.
External engagement and capacity building	Increase collaboration with suppliers and other stakeholders to improve their capacity to address modern slavery risks.	Conduct MS training for all Commercial team members.
		Host supplier town hall session.
		Conduct MS training for logistics providers.
		Develop and nurture new relevant partnerships.
		Invite every own-brand supplier to a one-to-one capacity-building session.

ROADMAP FOCUS AREAS	OBJECTIVE	FY24 KEY COMMITMENTS
Reporting	Communicate our commitment to assist in the prevention, response and remediation of modern slavery and meet compliance obligations under the Modern Slavery Act.	Publish MSS FY24.



Process of Consultation and Approval

The related reporting entities covered by this joint statement have been consulted and informed of the reporting requirements of the MSA. The respective General Managers of each of the Winning Group businesses meet regularly to discuss and consult on their individual obligations in relation to Modern Slavery, as well as the ways in which their units feed into the larger Group operation.

As responsible sourcing is at the heart of the Winning Group’s Sustainability Strategy, senior management of our Marketing, Sales, Buying, Operations, Strategy, Legal, Finance, Sustainability, Technology, Customer Service and HR units have all collectively discussed and engaged with the MSA, and the ways in which the Winning Group as a whole can make a positive impact on reducing the risk of modern slavery within our supply chains.

The various training, information sessions, dissemination of MSSAQs, Supplier Code of Conduct, and collaborative supplier engagement conducted by the various entities demonstrate the consultation that has been undertaken between the relevant reporting entities.

This joint FY23 statement has been approved by the Board of Directors on behalf of itself and its reporting entities on 18 December 2023.



John R Winning
CEO, Winning Group



John W Winning
Director, Winning Group



Amy E Cowper
General Counsel and Company Secretary

Appendix

Appendix A: Mandatory Reporting Criteria Mapping

REPORTING CRITERIA	SECTIONS	PAGE
Identify the reporting entity	About this Statement	2
Describe the reporting entity’s structure, operations and supply chains	Our Structure, Operations, and Supply Chains	6–8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Our Modern Slavery Risks	9–11
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Our FY23 Key Actions and How we Assess and Address our Modern Slavery Risks	5, 12–19
Describe how the reporting entity assesses the effectiveness of these actions	How we Assess the Effectiveness of our Actions	20–21
Describe the process of consultation with any entities the reporting entity owns or controls, including consultation with entities	Process of Consultation and Approval	24
Provide any other supporting information	Case Studies	16, 20
	Our F24 Commitments	22–23
Board approval of the statement	Process of Consultation and Approval	24

